

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA**

**JUSTINA CHAPPELL, AS  
ADMINISTER OF THE ESTATE  
OF DELYLE WALTER  
CHAPPEL,**

*Plaintiff,*

**v.**

**PRECISION DRILLING  
CORPORATION, *et al.***

*Defendants.*

**CIVIL ACTION**

**C.A. No. 3:23-cv-00604-RDM**

**PLAINTIFFS' RULE 26  
DISCLOSURES**

**RULE 26(a)(1) INITIAL DISCLOSURES OF PLAINTIFF  
JUSTINA CHAPPELL**

Plaintiff, Justina Chappell, and Saltz, Mongeluzzi Bendesky PC disclose the following pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

**A. DISCLOSURES PURSUANT TO F.R.C.P. 26(a)(1)(A)(i)**

The following individuals are likely to have discoverable information that Plaintiffs may use to support their claims or defenses:

1. Jonathan – District Manager, Frank's International
2. Marshal Crawford, Frank's International 979-525-6472
3. Craig Watts – Offsite General Supervisor -\
4. Rig Manager Matt Wallace, Precision Drilling
5. Operation Manager, Precision Drilling, Bob Goodwin: 701-334-0110

6. PA State Police/Police Officer Trooper Joseph Bissol – non criminal report: #2021-490112/ investigative file not being released.

**B. DISCLOSURES PURSUANT TO RULE 26 (a) (1) (A) (ii)**

The following is a description, of all documents, electronically stored information, and tangible things that are in Plaintiffs' possession, custody, or control and that Plaintiffs may use to support their claims or defenses, except solely for impeachment:

1. Any and all exhibits, documents and submissions that have been previously filed with the Court of Common Pleas Lackawanna County, and in the instant matter; in this and any and all related adversarial and non-adversarial proceedings; and
2. Complaint filed and Reinstated as Case No:2023-1110T, Lackawanna Court of Common Pleas.
3. OSHA reports for Precision Drilling, Frank's International LLC, and Cabot Oil and Gas.
4. Death Certificate and Letters of Administration.
5. Autopsy Report/photos; Coroner's Report; Toxicology Report
6. EMHS Montrose
7. Workers Compensation Decision
8. Photos and texts from Justin

**C. DISCLOSURE PURSUANT TO RULE 26(a) (1) (A) (iii)**

Plaintiff makes claims for financial losses that resulted from the Defendants legal negligence and strict product liability. Specific computations of Plaintiff's damages will be provided by way of expert reports, to be provided within the time established by the applicable scheduling order.

**D. Disclosure Pursuant to Rule 26(a)(1) (A)(iv)**

The documents and electronically stored information that are in Plaintiffs' possession, custody, or control and that relate to Defendant's liability are listed above in Section B. All documents and/or items listed in Section B will be provided to counsel for Defendants directly. Plaintiffs reserve the right to supplement these Initial Disclosures.

**SALTZ MONGELUZZI BENDESKY PC**

BY: /s/ Michael A. Budner  
ROBERT J. MONGELUZZI  
ANDREW R. DUFFY  
MICHAEL A. BUDNER

**CERTIFICATE OF SERVICE**

I certify that the above was submitted to all counsel via electronic filing October 9, 2023.

**SALTZ MONGELUZZI BENDESKY PC**

BY: /s/ Michael A. Budner  
ROBERT J. MONGELUZZI  
ANDREW R. DUFFY  
MICHAEL A. BUDNER